

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

ERROL A. HENDERSON, Plaintiff, v. THE PENNSYLVANIA STATE UNIVERSITY, Defendant.	Civil Action No. 4:21-cv-00872 (Honorable Matthew W. Brann) <i>Electronically Filed</i>
--	---

JOINT STATUS REPORT

Pursuant to the Court’s August 8, 2022 Order (ECF No. 35) and in accordance with the October 7, 2022 Joint Status Report (ECF No. 36), Plaintiff Errol A. Henderson and Defendant The Pennsylvania State University (“Defendant”) (collectively, the “Parties”), by and through their undersigned attorneys, report that they participated in private mediation on December 12, 2022. During the mediation, the Parties reached an agreement and are finalizing the terms of the settlement agreement. The Parties propose that they provide the Court with a further status update by January 30, 2023. As such, the Parties request that the Court (1) maintain its Stay of Proceedings until and including January 30, 2023 and (2) provide that the Parties submit another Joint Status Report on or before January 30, 2023.

Date: December 22, 2022

/s/ Rahul Munshi

Stephen G. Console (PA 36656)
Rahul Munshi (PA 307548)
CONSOLE MATTIACCI LAW, LLC
1525 Locust Street, Ninth Floor
Philadelphia, PA 19102
Phone: 215.545.7676
Fax: 215.814.8920
console@consolelaw.com
munshi@consolelaw.com

Counsel for Plaintiff

Respectfully,

/s/ Sarah E. Bouchard

Sarah E. Bouchard (PA 77088)
Ali M. Kliment* (PA 318988)
Margaret M. McDowell* (PA 322619)
MORGAN, LEWIS & BOCKIUS LLP
1701 Market Street
Philadelphia, PA 19103
Phone: 215.963.5000
Fax: 215.963.5001
sarah.bouchard@morganlewis.com
ali.kliment@morganlewis.com
margaret.mcdowell@morganlewis.com

Ami N. Wynne*
MORGAN, LEWIS & BOCKIUS LLP
110 N. Wacker Drive
Chicago, IL 60606
Phone: 312.324.1000
Fax: 312.324.1001
ami.wynne@morganlewis.com

**Admitted pro hac vice*

Counsel for Defendant

CERTIFICATION OF SERVICE

I, Sarah E. Bouchard, hereby certify that on this 22nd day of December, 2022, a true and correct copy of the Joint Status Report was served upon the following by electronic filing with the Clerk of the United States District Court for the Middle District of Pennsylvania, and is available for viewing and downloading from the ECF system:

Stephen G. Console
Rahul Munshi
Console Mattiacci Law, LLC
1525 Locust Street, 9th Floor
Philadelphia, PA 19102
console@consolelaw.com
munshi@consolelaw.com

/s/ Sarah E. Bouchard
Sarah E. Bouchard